

PHILLIP A. TALBERT
United States Attorney
MATHEW W. PILE, SBN WA 32245
Associate General Counsel
Office of Program Litigation, Office 7
Social Security Administration
SOHAYL VAFAL, SBN CA 319266
Special Assistant United States Attorney
6401 Security Boulevard
Baltimore, Maryland 21235
Telephone: (510) 970-4838
E-Mail: sohayl.vafai@ssa.gov
Attorneys for Defendant

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

JENNETE LYNN STANCY,)	Case No.: 2:23-cv-00604-TLN-DMC
)	
Plaintiff,)	STIPULATION AND ORDER FOR AN
)	EXTENSION OF TIME
vs.)	
KILOLO KIJAKAZI,)	
Acting Commissioner of Social Security,)	
)	
Defendant.)	

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's Motion for Summary Judgment be extended 30 days from September 11, 2023, up to and including October 11, 2023. The parties further stipulate that the Court's Scheduling Order shall be modified accordingly. This is the Defendant's first request for an extension of the Cross-Motion for Summary Judgment deadline.

There is good cause for this extension. Defendant requires additional time to review the defensibility of this case. Additional time would provide Plaintiff an opportunity to consider any remand offer, the parties to negotiate the terms of any remand offer, and Defendant adequate time to prepare her response if the parties cannot agree to a voluntary remand.

1 For these reasons, Defendant respectfully requests an extension of 30 days, until October
2 11, 2023, to file the cross-motion for summary judgment. This request is made in good faith and
3 is not intended to delay the proceedings in this matter.

4 Respectfully submitted,

5 Dated: September 7, 2023

/s/ Melissa Markos Nyman*
(*as authorized via e-mail)
MELISSA MARKOS NYMAN
Attorney for Plaintiff

8 Dated: September 7, 2023

9 PHILLIP A. TALBERT
United States Attorney
MATHEW W. PILE
Associate General Counsel
Social Security Administration
11 By: /s/ Sohayl Vafai
12 SOHAYL VAFAI
13 Special Assistant U.S. Attorney
14 Attorneys for Defendant

15 **ORDER**

16 Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an
17 extension, up to and including October 11, 2023, to respond to Plaintiff's Motion for Summary
18 Judgment.
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20 Dated: September 7, 2023

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22 DENNIS M. COTA
UNITED STATES MAGISTRATE JUDGE
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